

INVORA

BACKGROUND:

- EPA is currently reviewing a registration application for use of the herbicide Invora requested for use on **rangeland and pastures**. The product contains the chemicals aminocyclopyrachlor (ACP) and triclopyr and would be used to manage difficult large brush invasion and large weeds.
- Ranchers and cattlemen seek a narrow use of ACP on wide swaths of land, reducing some of the concerns with past uses of ACP which were problematic.
- ACP presents significant, but manageable, concerns for off-target damage in broadleaf plants and woody species. This risk is known from guideline plant data as well as damage caused by previously approved uses, which resulted in a significant number of tree deaths.
 - The incidents were associated with use on turf and non-crop areas (i.e., rights-of-way areas) and in cases involved high value and old growth trees. Use on turf was previously available but is now cancelled.

KEY POINTS:

- The risk assessment and technical evaluation for the pasture and rangeland registration request is ongoing. The review is challenging because ACP is both highly toxic to non-target plants and persistent in the environment.
- EPA HQ and R6 staff have been gathering information and feedback from users and crop production experts to fully understand the pest management challenges that ranchers and cattlemen currently face in their operations.
- Compost contamination risks have been identified with the proposed use on pastures and rangeland (as experienced with other chemicals in the same class, but with greater severity expected). EPA is working with stakeholders to develop mitigation and management approaches to avoid these risks.
- In order to improve the Agency's understanding of the more limited uses on pastureland by cattlemen and ranchers, EPA held a half day workshop in early August. The workshop was attended by the registrant, EPA, ranchers and cattlemen, university specialists, USDA, and other stakeholders. It involved information-sharing about production requirements and management options for professionally managing these difficult weeds in rangeland areas.
- Following the workshop, EPA anticipates that the registrant may adjust and narrow its proposed label to more specifically mitigate against non-target plant damage. Therefore, EPA remains open to receiving an updated regulatory request from Bayer as follow up to the August 8, 2019, workshop.

TALKING POINTS:

Ex. 5 Deliberative Process (DP)